

# Exhibit Q

*Certified Copy*

1                   **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
2                   **COUNTY OF LOS ANGELES**

4                   **LAOSD ASBESTOS CASES** )  
5                   **PUI FONG and THAI WONG,**         )  
6                          Plaintiffs,                 ) JCCP Case No. 4674  
7                          vs.                         ) LASC CASE NO.  
8                          ) BC 675449  
9                   **IMERYS TALC AMERICA, INC.;**         )  
10                   **et al.,**                         )  
11                          Defendants.                 ) VOLUME II  
12   ) Pages 170-300

13                   **CONTINUATION OF THE TELEPHONIC DEPOSITION OF**  
14                   **WILLIAM E. LONGO, PH.D.**

15  
16                   **February 12, 2019**

17                   **11:40 a.m.**

18  
19                   **Suwanee, Georgia**

20  
21                   **Frances Buono, RPR, CCR-B-791**



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12                  Inc.; and Imerys Talc Vermont, Inc.:

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21                  Inc.:

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1           A. He has a degree in geology. He has been  
2 doing this type of analysis for 30 years. He was  
3 trained, I think at McCrone, way back when. And he  
4 has the patience to analyze at the PLM level that  
5 takes long periods of time. This is not your  
6 standard PLM analysis that somebody may do for an  
7 asbestos-containing bulk sample. It --

8           Q. Why does it take so much longer to analyze  
9 talc for asbestos using PLM than a typical  
10 asbestos-containing material?

11          A. Well, it doesn't have to take that long,  
12 and I think the results show it. You don't find  
13 anything. Because you're at these trace levels, you  
14 have to make sure you cover the entire area.

15           Paul looks at approximately  
16 950 millimeters squared area. And you have to be  
17 able to spend the time.

18           And in addition to him doing that,  
19 spending the time, we have a high definition camera  
20 set up on the polarized light microscope connected to  
21 a high definition monitor so that when Mr. Hess finds  
22 a potential amphibole structure, he can then look at  
23 it on the monitor so that he can do fine focus. And  
24 also we have a special objective lens that's a plane  
25 objective lens that flattens the -- gives you a

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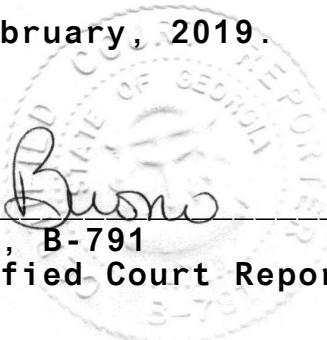
1 C E R T I F I C A T E  
2

3 STATE OF GEORGIA:

4 COUNTY OF HALL:

5  
6 I hereby certify that the foregoing  
7 transcript was taken down, as stated in the  
8 caption, and the questions and answers thereto  
9 were reduced to typewriting under my direction;  
10 that the foregoing pages 170 through 296  
11 represent a true, complete, and correct  
12 transcript of the evidence given upon said  
13 hearing, and I further certify that I am not of  
14 kin or counsel to the parties in the case; am  
15 not in the regular employ of counsel for any of  
16 said parties; nor am I in anywise interested in  
17 the result of said case.

18 This, the 14th day of February, 2019.

19  
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21   
FRANCES BUONO, B-791  
Georgia Certified Court Reporter  
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